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MONTANA EPA AGREEMENT 1985

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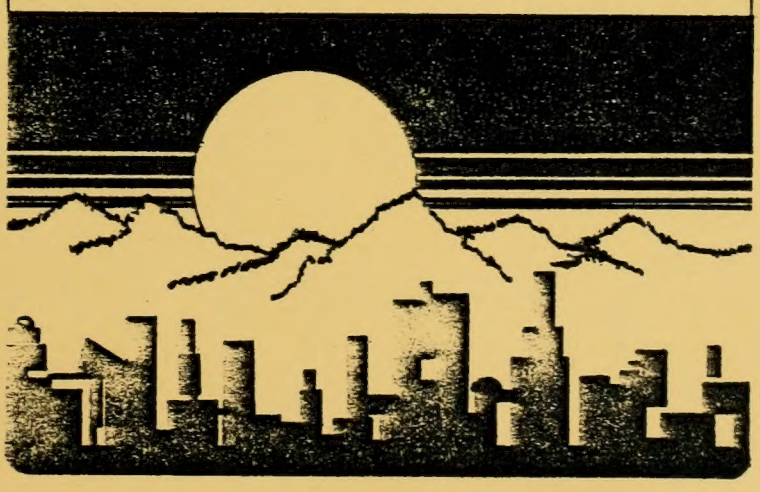

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MONTANA/ENVIRONMENTAL PROTECTION AGENCY

AGREEMENT

UPDATE

Agreement on the Management and Administration

of Montana's Environmental Program

for Federal Fiscal Year 1985

October 1984

Approved:

The undersigned hereby execute this Cooperative Agreement on the Management and Administration of Montana's Fiscal Year 1985 Water Pollution Control, Safe Drinking Water, Air Quality, Solid and Hazardous Waste Management, Superfund, Pesticides, and Toxics programs.

State of Montana

Ted Schwinden
Governor, State of Montana

26 Sept 84
Date

John J. Drynan, M.D., Director
Department of Health and
Environmental Sciences

26 Sept. 1984
Date

Keith C. Kelly, Director
Department of Agriculture

26 Sept 84
Date

Environmental Protection Agency

John G. Welles
Regional Administrator

October 19, 1984
Date

John F. Wardell, Director
Montana Office

September 26, 1984
Date

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INTRODUCTION

This is the second year of the Montana/EPA Agreement. Revisions have been made to the narrative only when there have been substantial changes in the programs.

The work plans are the comprehensive program objectives with the anticipated available resources. The plans cover the period October 1, 1984 to June 30, 1985. These nine month plans will effect the changeover from Federal to State fiscal year.

Program Environmental Summaries

The Montana Department of Agriculture (DOA) projects the following Environmental Protection Agency (EPA) funded program activities (this does not include state funded activities in these categories) by the end-of-year federal FY 1984:

	End-of-year FY 1984
Dealer Inspections	141
Pesticide Applicator Inspections	187
Use/Misuse Inspections	50
Market Place Inspections	133
Establishment Inspections	3
Pesticide Accident Investigations	15
Special Investigations	10
Collection and Analysis of Samples:	
Formulation Analysis Performed	650
Residue Analysis Performed	1350
Quality Control Analysis Performed	300
Pesticide Samples Received From EPA--Analysis Performed	350
Certification Training and Examination	
Commercial Applicators (New)	150
Private Applicators (New)	342
Continuing Certification Training Dealers and Applicators	814

The DOA collected the final environmental samples for the endrin-chlorpyrifos study. Laboratory analysis of these samples will be completed and the results incorporated into the final report for EPA, due in September.

Priority and Accomplishment Strategies

Water

Construction Grants

Continue to evaluate the construction grant program by using instream monitoring.

The 205(g) delegation agreement executed during FY 1981 provides for the state to perform 21 of 22 major program functions. The state shall be responsible for the day-to-day management of construction grant oversight of delegated activities. The state modified the 205(g) functional agreements to reflect PL 97-117 in FY 1984 and will continue to work with EPA to develop an annual work plan to meet EPA's water accountability system.

Pesticides

Enforcement

The DOA developed a pilot ground water monitoring program. Four areas in the state, which met certain predetermined geologic and hydrologic criteria, were selected. Within the four areas 22 specific well sites were chosen. The ground water from each site will be analyzed for pesticides known to have been used in the general area. Each site will be monitored twice during the pesticide use season. The pilot monitoring program was completed in FY 1984 and the report will be completed in FY 1985.

Certification

The strategy for recertification will be to provide recertification training for the following applicator categories: Agricultural Plant Pest Control, Agricultural Animal Pest Control, Public Health Pest Control and Mosquito Abatement. Additionally, the private applicators in Agricultural District II will receive recertification training specific to their needs (crops, cropping systems and pest complexes present in these counties).

The specific activities and accomplishment commitments (federal and state) are found in the Pesticides Media Work Plan.

Enforcement Agreements

During FY 1985 the state and EPA will jointly develop and implement agreements to strengthen the state/federal enforcement partnership.

MEDIA WORK PLANS

Air

Water

Hazardous Wastes

Pesticides

Categorical Programs

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
I. Air Activities					
A. Point Source Compliance					
1. Inspect Class A sources and submit available inspection reports which establish and clearly state compliance status to EPA. Submit to EPA within 10 days of completion inspection reports of major sources which document violations.			2.40	.20	AQB
2. Perform oversight inspections of Class A sources.	4	6		.08	EPA
3. Evaluate and follow-up on excess emission reports.	Continuing				AQB
4. Initiate formal enforcement action within 30 days after sufficient evidence of violation by a major stationary source. Provide EPA with copies of NOV's and Orders and all other information relative to actions within ten days of establishment of such records.	Continuing		1.00		AQB
5. A formal enforcement action will be commenced, as required by current regional enforcement policy, following documentation of any violation by a major stationary source.				.08	EPA
6. Develop a formal agreement which details EPA and State responsibility for initiation of enforcement actions against violating major sources.		As Required			EPA, AQB

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
B. Area Source Compliance - Inspect significant area sources at least once per year.		As Required	.40		AQB
C. Emission Monitoring			.75		
1. Develop a program for the review of Continuous Emission Monitoring (CEM) data and explore an expanded role for CEMs in continuing compliance and implementation plan development activities.					AQB
2. Develop a plan for systematic evaluation of stack sampling results.					
D. Update the Emission Inventory System and provide EPA with quarterly updates. Review the classification of major sources as A-1 or A-2.			.50	.03	AQB, EPA
E. New Source Review			2.00	.34	AQB, EPA
1. Permits - Issue new source permits. Copies of permits will be sent to EPA.	45	90			AQB
2. New PSD Review - Review and issue PSD permits. Copies of permits will be sent to EPA.		As Required			AQB, EPA
3. Baseline Monitoring and Data - Review industry baseline monitoring systems and subsequent data for PSD sources.		As Required			AQB
4. Increment Modeling and Tracking - Review baseline monitoring systems and subsequent data submitted by applicants for PSD permits.		As Required			AQB

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
F. Continue tracking Missoula CO progress and modify SIP if warranted.		As Required	1.50	.01	AQB, EPA
G. Track implementation plans in nonattainment areas.		As Required	.20	.05	AQB, EPA
H. Submit redesignation requests for nonattainment areas.			1.20	.15	AQB, EPA
1. Colstrip TSP - Submission by State.	10/84				AQB
- EPA action.		4/85			EPA
2. Columbia Falls TSP - Submission by State.	12/84				AQB
- EPA action.		6/85			EPA
3. Billings TSP - Submission by State.	12/84				AQB
- EPA action.		6/85			EPA
4. Billings CO - Submission by State.	12/84				AQB
- EPA action.		6/85			EPA
5. Great Falls TSP - Submission by State.		3/85			AQB
- EPA action.		9/85			EPA
I. Oil Well Flaring					
1. Continue evaluation of oil well related emissions in the Williston Basin.		As Required			

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
2. Coordinate with North Dakota similar air quality impacts.	Date of Completion	As Required			
3. Consider rulemaking for control of oil well related emissions.		As Required			
J. Ambient Monitoring			5.40	.20	AQB, EPA
1. Complete annual network review, including PM_{10} monitoring.	1 Report	4/85			AQB, EPA
2. Complete annual review of quality assurance plan and standard operating procedures.		6/85			AQB, EPA
3. Quarterly reporting of NAMS/SLAMS data and agency precision and accuracy data.	As Required	Ongoing			AQB
4. Perform system audits of State air monitoring program.		4/85			EPA
5. Complete annual SLAMS reports.		6/85			AQB
K. Training			.75		AQB
L. Prepare annual SIP progress report.		4/85			AQB
M. Conduct NAAS annual audit.		5/85	.40	.12	AQB, EPA
N. Develop SIP revisions as necessary within 9 months of promulgation of new or revised National Ambient Air Quality Standards.	As Required		.75		
O. Develop visibility SIP for protection of Class I Areas within 9 months of promulgation.	As Required		.75	.05	AQB, EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
I. Water Pollution Control	Date of Completion				
A. Administration					
1. Provide general program direction and supervision and development of staffing and budget needs.			.50		WQB
2. Administrative support.			1.50		WQB
3. General policy guidance and periodic review of program outputs.			.08	.12	WQB, EPA
B. Wastewater Discharge Permit Program					
1. Issue, reissue or modify within 6 months of application or expiration date major permits ensuring that water quality standards are met, toxic criteria limitations and pretreatment requirements are imposed, residual wastes are handled adequately and appropriate effluent limitations and self-monitoring are provided. EPA Montana issues permits on Indian Reservations.	5	7	.70	.20	WQB, EPA
2. Issue, reissue or modify within 6 months of application or expiration date minor permits or general permits as needed to eliminate backlog of expired permits.			1.27	.05	WQB, EPA
3. Conduct compliance inspection program with quarterly reports to EPA of completed inspections.					

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
a. All major municipal facilities will be inspected (compliance monitored or O&M inspected) at least annually with composite sampling at mechanical plants whenever possible.	10	26	.27		WQB
b. All major industrial facilities will be compliance monitored (sampled or evaluated) at least annually.	6	19	.23		WQB
c. Minor municipal and industrial facilities will be inspected when problems are suspected and as time permits. EPA conducts inspections on Indian reservations.			.08	.15	WQB, EPA
4. Provide appropriate enforcement actions.					
a. Violations which are continuing and causing damage to an existing beneficial use will be given prompt attention.					
b. Violations by major dischargers with discharges of toxic materials will be given high priority.			.68		WQB
c. Other violators will be handled as time allows.	As Needed	As Needed		.40	EPA-Montana & Denver
d. State will be informed of EPA enforcement activities.					EPA
e. EPA will initiate necessary follow-up actions against those permittees where the state action is not adequate to meet the requirements of the Clean Water Act.	As Needed	As Needed	.08	.03	EPA-Montana & Denver

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
5. Provide review and appropriate notification on self-monitoring information as reports are received. EPA-Helena reviews self-monitoring reports for Indian reservation facilities for which responsibility has not been delegated.	Date of Completion Ongoing	Ongoing	.37	.08	WQB, EPA
6. EPA 309(a) Notice of Violations (NOVs).	As Appropriate				
a. EPA summary of outstanding 309(a) NOVs.					
b. State response on outstanding 309(a) NOVs.					
7. Quarterly Noncompliance Reports for majors using National definition of significant noncompliance. Includes enforcement action summary report.	2	4	.15	.04	WQB
8. Semiannual Compliance Reports for completed federally-funded minor municipalities.	1	2	.04	.04	WQB, EPA
9. Reconnaissance inspections. Estimated number = 75.	30	75	.37	.04	WQB, EPA
10. Conduct joint activities to achieve approvable local pretreatment programs where needed and include requirements in permits.	2	3	.08	.10	WQB, EPA Montana & Denver
11. Investigate complaints of illegal discharges and possible violations of water quality standards and provide follow-up.	Ongoing	Ongoing	.45	.08	WQB, EPA
12. Implement the municipal compliance strategy which coordinates the activities of the permits/enforcement program and the construction grant program to improve municipal facility compliance.	Ongoing	Ongoing	.15	.04	WQB, EPA
13. Provide copies of all file documentation for major and designated minor permits to Montana Office.	As Required	As Required	.08	.04	EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
14. Follow up on the most significant problems identified through the DMR QA program and provide annual report to EPA. The results of this program will be utilized as a tool in selecting inspection candidates.	Date of Completion	9/85	.04		WQB
15. State program overview, policies, procedures and output reviews. Complete revision of the NPDES delegation agreement during FY 85.	12/84			.10	EPA, WQB
16. Major permittees in significant noncompliance as of 6/30/84 will be returned to compliance or addressed by enforcement action during FY 85.					
17. State commits to negotiating a percent compliance rate to be achieved by 9/30/85 for major and designated minor permittees.					
C. Groundwater (excludes UIC)					
1. Implement groundwater pollution control program in accordance with adopted regulations.			.38		WQB
2. Investigate complaints of groundwater pollution and provide recommendations. Provide enforcement when needed.			.15		WQB
3. Monitor groundwater problems and obtain groundwater samples for analyses.			.15		WQB
D. 404 Permit Review and 401 Certification					
1. Review proposed 404 permits to assure that projects will not violate WQ standards or that appropriate conditions to certification are imposed to prevent WQS violations. Conduct inspections as necessary.	Ongoing		.10		WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
2. Review other proposed Federal permits (e.g., Forest Service, BLM Special Use permits, FERC permits) to assure that WQ standards are not violated or that appropriate conditions to certification are imposed to prevent WQS violations. Conduct inspections as necessary.	Date of Completion Ongoing		.05		WQB
3. Assist with the coordination of 310 and 404 permit programs.	Ongoing		.10		WQB
4. Issue 3(a) authorizations for short-term activities which exceed turbidity standards.	Ongoing		.20		WQB
5. Review and comment on proposed 404 permits to assure that projects are compatible with 404(b)(1) guidelines, or that appropriate conditions to insure compliance with 404(b)(1) guidelines are included. Conduct inspections as necessary.	Ongoing		.05	.25	EPA
6. EPA will evaluate the potential for the State to assume the 404 Program under EPA's streamlined 404 State Program Regulations. The evaluation will assess State interest, capability, legal authority, and impediments to assumption.				.05	EPA
E. Water Quality Standards					
1. State will submit revised and adopted water quality standards and nondegradation rules to EPA for review and approval/disapproval. Any new or revised State standard must be accompanied by some type of supporting analysis.	10/84		.10		WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
2. EPA will review the State water quality standards and notify the State within 60 days that the revisions are approved or notify the State within 90 days that the revisions are disapproved. Such notification of disapproval shall specify the changes needed to assure compliance with the requirements of the Clean Water Act and the WQS regulation.	Date of Completion 12/84 or 1/85			.10	EPA
3. State and EPA will schedule the necessary activities for Use Attainability Analyses on Prickly Pear Creek, Muddy Creek, Hot Springs Creek and Silver Bow Creek.	12/84		.05	.10	WQB, EPA
4. EPA will provide technical assistance on request and as resources allow in selecting study sites, conducting use attainability assessments and developing site-specific criteria.		6/85		.05	EPA
F. Wasteload Allocation/Total Maximum Daily Loads					
1. The State shall develop WLA's during permit development process.	Ongoing		Resources included in Wastewater Discharge Permit Program		WQB
2. The State will schedule monitoring and data collection efforts in support of WLA's.	Ongoing				WQB
3. EPA will review the WLA during the permit proposal process.	Ongoing				EPA
4. The State will incorporate WLA's into permits.	Ongoing				WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
G. Operation and Maintenance	Date of Completion				
1. State will conduct 7500-5 on-site inspections, or the equivalent, using State inspection forms. Publically owned wastewater treatment works will be inspected at least once every three years.	25	50			WQB
2. State will publish Big Sky Clearwater twice per year.	12/84	6/85	Also Utilize Resources in Drinking Water & Construction Grants		WQB
3. State will coordinate and monitor 104(g)(1) grants program with Northern Montana College and consultant.	Ongoing				WQB
4. State will develop a statewide operator training strategy in conjunction with Northern Montana College; this may include consideration of 109(b) facility.	10/84				WQB, NMC
5. State will coordinate O&M and enforcement activities and better ensure accurate DMR's.	Ongoing				WQB, EPA
6. EPA will assist, review progress, and oversee conduct of 104(g)(1) grant activities	As necessary			.15	EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
H. Monitoring	Date of Completion				
1. State will carry out Lower Clark Fork River Monitoring Program (30 stations).	See Program Schedule		.65		WQB
2. State will conduct monitoring on seven Upper Clark Fork River monitoring stations.					WQB
Clark Fork River at Garrison Clark Fork River at Deer Lodge Clark Fork River at Warm Springs Silver Bow Creek above Warm Springs Ponds Silver Bow Creek below Warm Springs Ponds Mill Willow Bypass Warm Springs Creek at Mouth	Monthly Chemical		.15		
3. State will conduct additional monitoring activities in support of permits, construction grants, water quality standards, wasteload allocation studies, as needed.	Ongoing		.10		WQB
4. EPA will provide coordination and assistance to state in Clark Fork monitoring.	Ongoing			.20	EPA
I. State will update quality assurance plan and field and laboratory procedures for water monitoring as needed to maintain approved quality assurance program.	Ongoing			.05	WQB, EPA
J. Maintain Data Management Program			.40	.15	EPA
1. Keep files up to date.					WQB
2. Continue editing of data files.					WQB
3. Make periodic entries into STORET.					WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
4. Continue effort on development of data management system for WQB biological data.	Date of Completion				WQB
5. Process water quality data submitted by the State into STORET.				.10	EPA
6. Prepare data for water quality trends-1984				.10	EPA
II. Drinking Water Program - Public Water Systems		6/30/85			
A. Administer program according to the Federal SDWA, State statutes and regulations, and grant regulations and conditions.			.75	.60	
1. Provide quarterly reports of violation data to EPA within 90 days of the end of each calendar quarter in the format requested by EPA.		4			WQB
2. Participate in program evaluation/oversight/data verification performed by EPA.		1			WQB
3. Administer local health department contracts for inspections of public water supplies.		21			WQB
B. PWS surveillance and technical assistance.			1.50		
1. Conduct inspections of PWS's and make written reports. EPA will participate in approximately 5 percent of inspections conducted by WQB staff.				.05	
a. WQB staff.		75			WQB
b. Contracted sanitarians.		600			WQB
c. Contracted individual(s).		300			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
2. Investigate suspected waterborne disease outbreaks.	Date of Completion	By Incident			WQB
3. Investigate suspected incidences of underground sources of drinking water contamination.		By Incident			WQB
C. Review plans and specifications for all new and/or modified PWS's.		80	1.05		WQB
D. Train and certify water system personnel. *One 1-week course 10 Day Seminars 2 Certification Tests Given		*	.80		WQB
E. Enforce program regulations.			1.05		WQB
1. Monitor compliance of each PWS with program regulations.		2,014			
2. Assure that MCL violations are being corrected.					
3. Advise PWS's to give effective public notification of violations.					
4. Work towards achieving the following EPA compliance targets:					
a. Microbiological MCL - 93% compliance from all systems and no more than 0.5% persistent violations.					
b. Microbiological M/R - 75% compliance from all systems and no more than 7% persistent violators.					

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
c. Turbidity MCL - 97% compliance from all systems and no more than 0.5% persistent violators.	Date of Completion				
d. Turbidity M/R - 93% compliance from all systems and no more than 1% persistent violators.					
5. Take legal enforcement actions against recalcitrant and persistent violators.		As needed			
F. Maintain records essential for PWS program including inventory of all PWS's.		2,014	1.05		WQB
G. Provide laboratory capability to conduct analysis necessary for the program.					WQB
1. Recertify private microbiological laboratories to which PWS's submit samples for required analyses.		5			Lab
2. Bacteriological samples.		7,500			Lab
H. Underground Injection Control (UIC)					
1. Permit Issuance					
a. Review applications for and issue permits for new Class II wells and/or fields.		20			
b. Review applications for and issue permits for existing Class II salt water disposal wells.		35			

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
2. Surveillance and Investigation	Date of Completion				
a. Assure compliance with permit and other regulatory requirements through compliance inspections.		20			
b. Notify owner/operator and require mechanical integrity testing.		75			
c. Witness required mechanical integrity testing.		20			
d. Review operator supplied compliance reports.		7/85			
3. Administration					
a. Update Class II injection well inventory.	11/84				
b. Do annual report as required by 40 CFR 144.8(b).		2/85			
c. Update Class V inventory.					

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
III. Water Quality Management	Date of Completion				
A. Water Quality Management					
1. State will maintain 1984 list of priority water bodies, update it as necessary, and will use the list to reach decisions which result in the greatest water quality and public health benefit.	Ongoing				WQB
2. State will review construction grants and NPDES permit decisions for consistency with WQM plans.	Ongoing		.10		WQB
3. State must report on the nature, extent and causes of water quality problems in the State. This requirement can be satisfied by either; a letter certifying that the current 305(b) report is up to date; a supplement to the 1984 305(b) report; or a new water quality assessment report.		6/85			WQB
4. State will conduct water quality management and nonpoint source pollution control activities as described in the 205(j) workplan. These activities will be directed at yielding the greatest water quality and public health benefits.	See 205(j) Workplan				WQB
a. Conduct Clark Fork River monitoring and assist DFWP in preparing application for an instream flow reservation.			.75		
b. Continue data collection and evaluation effort for stream recovery/WWTP upgrade studies for East Gallatin River, Big Spring Creek, Bitterroot River and Hot Springs Creek and begin a similar effort on Ashley Creek (Kalispell WWTP).			.50		

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
c. Continue data collection and monitoring, refinement, and oversight of implementation of Freezeout Lake/Priest Butte Lakes/Teton River Water Management Plan.	Date of Completion		.10		
d. Monitor water development activities on the Yellowstone River to ensure no interference with DHES instream flow reservation.			.05		
e. Pursue development of computerized biological water quality data system (as resources allow).			.15		
f. Continue provision of technical and planning assistance to Conservation Districts to promote water quality improvement efforts (e.g., assistance with 310 program, stream dynamics workshop, assistance with implementation of Prickly Pear Creek Management Plan, Saline Seep, Muddy Creek).			.45		
g. Monitor Forest Service and Bureau of Land Management activities in accordance with cooperative agreements (e.g., Forest plans, activities in municipal watersheds, Idaho Silvicultural Task Force).			.15		
h. Monitor Flathead Lake phosphorus loading and continue efforts to develop control strategies.			.10		
i. Conduct miscellaneous core water quality management activities.			1.10		
5. EPA reviews progress and assists as necessary with implementation of water quality management activities.	Ongoing			.30	EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
6. Develop 205(j) workplan activities and prepare application for State Fiscal Year 1986.	Date of Completion	5/85	.05		WQB
7. Review 205(j) workplan and act upon application within 60 days.		6/85		.05	EPA
8. EPA provides copy of, and guidance regarding final 40 CFR Part 130 Water Quality Management regulation.	10/84			.05	EPA
9. State provides CPP.	10/84				WQB
10. EPA reviews CPP and approves/disapproves CPP.	12/84			.05	EPA
11. State implements CPP.	Ongoing				WQB
12. EPA reviews implementation by State.	Ongoing			.05	EPA
IV. Construction Grants					
A. Participate in Regional Construction Grants Oversight/ Office of Water Accountability Systems.			8.00	.55	WQB, EPA
1. Montana will submit detailed workplan containing core elements of the program including quantitative estimates of performance per Regional Construction Grants Oversight System and EPA's specific guidance (to be provided by September 1, 1984) by October 1, 1984. Upon acceptance by EPA it will become part of the SEA.					WQB
2. Montana will carryout the construction grants program in accordance with the 205(g) delegation agreement and the annual workplan. The Region will conduct all non-delegated functions consistent with these agreements.					WQB, EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
V. Water and Wastewater Operator Certification	Date of Completion				
A. Issue certification licenses to operators and give examinations to new operators.			.50		WQB Water & Wastewater Operator Certification Board
VI. Laboratory Support					
A. Provide certification by performing evaluations of laboratories which propose to do analyses which will be submitted for compliance with State regulations. Labs certified include:	Ongoing		.50		
1. Bacteriological laboratories.		14			
2. Chemical laboratories.		10			
B. Provide laboratory facilities with the capability to do analyses as required by the State regulations. The types of sample which the State Laboratory will analyze are:					
1. Bacteriological samples.		5,500			
2. Inorganic chemical samples.		275			
3. Organic chemical samples.		10			
C. Conduct performance audit inspections at selected MPDES facilities.		3			WQB, EPA

SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
I. Maintain legislation/regulation equivalent to RCRA and 40 CFR 124, 260-271, and other developmental activities such as public education and training.	Ongoing				.37		SWMB
II. Implement RCRA hazardous waste program activities.							
A. Inspections							
1. Non-notifiers	12	2	2	8	.15	.05	SWMB, EPA
2. Small quantity	8	2	3	3	.10	.04	SWMB, EPA
3. Generators	7	2	1	4	.50	.15	SWMB, EPA
4. Transporters	2	1	0	1	.10	.04	SWMB, EPA
5. TSD's							
a. Record reviews	7	2	3	2	.10	.05	SWMB, EPA
b. Physical on-site	7	3	0	4	.65	.30	SWMB, EPA
6. Follow-up	4	1	1	2	.12	.05	SWMB, EPA
7. Prepare inspection reports - 30 days/report	47	13	10	24	.05	.02	SWMB, EPA
B. Manifest exception and discrepancy reports	As Required				.06		SWMB, EPA
C. Permitting							
1. Permit application requests	2			2	.10		SWMB
2. Permit application completeness/ technical reviews	2	2	3		1.50	.60	SWMB, EPA
3. Draft permit conditions	3		1	2	.50	.30	SWMB, EPA
4. Permit issuance or denial	1			1	.15		SWMB
5. RCRA closure and Post closure (40 CFR 264-265) a. Plan review b. Final action	As Required				.31*	.23*	SWMB, EPA
6. Termination of interim status	As Required				.10		SWMB

*These resources to be expended only if closure/post closure required.

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
D. Enforcement*					.62		SWMB
1. Warning letters	16				.17		SWMB, EPA
2. Administrative Orders/NOV	3				.20		SWMB, EPA
3. Civil actions	2				.20		SWMB, EPA
4. Criminal actions	0						SWMB, EPA
5. Requests for EPA enforcement action	3	1		2	.05		SWMB, EPA
E. Reports Provided to EPA**					.20	.10	SWMB
1. Compliance Monitoring and Enforcement Log Sheets	Monthly						
2. Facility Status Sheets	Monthly						
3. Permit Status Sheets	Monthly						
4. Statistical Inspection/Compliance Summaries	Quarterly						
F. EPA Oversight							
1. Inspections	5	1	1	3	See		EPA
2. Enforcement Actions	3		1	2	Above	(.70)	
3. Permit Reviews	1		1	1	II.A.		
4. Closure/Post Closure	1		1				
5. State Program Audits	Mid-year						

* Enforcement numbers have been placed in this category at the request of EPA. The numbers were derived from formulas found in EPA program guidance and past State program experience. Because these numbers are projections, actual levels of enforcement activity may vary. However, enforcement action will be initiated for each violation noted: for Class III violations the action may be informal in nature.

**Reports to be submitted as soon as possible after the first of the month to the Montana EPA Office but no later than the 20th.

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
III. Implement Requirements of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA)							
A. Investigate sources of release and threats of possible release of hazardous substances.							
1. Perform investigations as provided under RCRA Subsection 3012 Grant Field Investigation Team (FIT). Number of 3012 PA/SI investigations pending 3012 Grant extension (or equivalent) in FY 1985.	14				.65	.375	SWMB, EPA
	Quarterly 3012 Report	10/30	1/30	4/30			SWMB
2. Direct other FIT activities.	As Needed				.05	.15	SWMB, EPA
3. Develop submission for National Priorities List (NPL).	5				.10	.07	
B. Review and make funding determinations for CERCLA actions to control releases when responsible party fails to provide proper response.	1				.10	.375	EPA, SWMB
C. Implement Cooperative Agreements for remedial investigations/feasibility studies, remedial measures at specific sites.					1.00	.75	SWMB, EPA
1. Milltown							
2. Silver Bow Creek							
3. New sites (as identified)							

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
D. Monitor enforcement/remedial activities at sites where responsible parties undertake clean-up activities.					.30	3.50	EPA, SWMB
1. East Helena							
2. Anaconda Smelter, Anaconda							
3. Libby							
4. New sites (as identified)*							
E. Reporting requirements including ADP.	To Be Determined**				.05	.07	EPA, SWMB

*Three sites proposed
**Awaiting additional guidance from Regional Office

IV. Maintain Solid Waste Management Program	Ongoing						
A. Inspection and enforcement.							
1. Continued maintenance of a waste management inspection program.							
2. Prepare and initiate enforcement actions where violations of license conditions have occurred.							
3. Follow-up inspections where enforcement action has taken place.							

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	END-OF-YEAR GRANTS EPA	END-OF-YEAR PRIMACY STATE	TOTAL	WORK YEARS FEDERAL GRANT	WORK YEARS PRIMACY STATE
I. Maintain the Field Pesticide Enforcement Program					
A. Conduct use/misuse/accident/ complaint inspections (as needed).	25	105	130	0.05	0.6
B. Conduct applicator inspections and Environmental Monitoring field investigations.	85	339	424	0.09	0.7
C. Conduct dealer inspections	64	257	321	0.09	0.3
D. Conduct market place inspections (label reviews product registration surveillance	64	257	321	0.05	0.12
E. Conduct inspections for compliance with storage and disposal of hazard waste pesticides (applicators, dealers, private applicators, homeowners).	30	120	150	0.09	0.5
F. Conduct producer establishment inspections (includes Label Improvement Programs (LIP) (CRP) program).	2		2	0.09	

GRANT - EPA and State Matching Funding.

PRIMACY - State Funding.

Grant Period 10/1/84 - 6/30/85

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	END-OF-YEAR GRANTS EPA	END-OF-YEAR PRIMACY STATE	TOTAL	WORK YEARS FEDERAL GRANT	WORK YEARS PRIMACY STATE
G. Collect producer establishment samples (formulations).	10		10	0.05	
H. Collect marketplace samples (formulations).		40	40	0.02	0.18
I. Collect complaint/damage case samples, Environmental monitoring and hazardous waste samples.	125	As needed 472	597		0.30
J. Other activities. - Imports, recalls, cancellation/ suspension - Embargoes - Monitor EUP's - Monitor 24(c)'s - Monitor Section 18's		As needed		0.05	0.20
II. Maintain the Administrative Enforcement Case/Compliance Program.					
A. Provide staff training.		As needed		0.02	0.06
B. Conduct compliance training for applicators/dealers.		As needed			0.30
C. Prepare, issue compliance orders, prosecute cases.		As needed		0.15	0.44

Grant Period 10/1/84 - 6/30/85

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	END-OF-YEAR GRANTS EPA	END-OF-YEAR PRIMACY STATE	TOTAL	WORK YEARS FEDERAL GRANT	WORK YEARS PRIMACY STATE
D. Review dealer restricted use sales records for violation of 12 (a) (2) (f).	280	770	1050	0.10	0.40
E. Monitor applicator records for certification compliance.	360	1440	1800	0.10	0.40
F. Monitor records for pesticide registration requirements.	60	240	300	0.05	0.05
G. Monitor compliance with administrative/ enforcement orders.		As needed			0.10
III. Maintain Laboratory Operations					
A. Analyze formulation samples; number analysis required.	23	92	115	0.1	0.2
B. Analyze residue samples; number analysis required.	150	837	987	0.5	1.45
C. Analyze quality control samples/ method development; number analysis required.	30	210	240	0.05	0.5
D. Maintain quality assurance program for laboratory.		As needed	0.10	0.10	
E. EPA pesticide and toxic samples. (Number may vary depending on analytical complexity)	100		100	0.75	

Grant Period 10/1/84 - 6/30/85

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	END-OF-YEAR GRANTS PRIMACY EPA	STATE	TOTAL	WORK YEARS FEDERAL GRANT	PRIMACY STATE
IV. Maintain the established Pesticide Applicator Certification and Training Programs.					
A. Maintain the computer programs for issuing applicator and dealer, private applicator certification credentials.	3,300 Credentials		3,300	0.40	0.40
B. Provide initial and certification/ recertification training for applicator and dealer, private applicator.	1,800		1,800 People	0.10	0.50
TOTAL WORK YEARS				3.0	7.8
V. Review/Evaluation					
A. Update management plan.			As Needed.		
B. Submit midyear and year end grant reports.					
C. Submit Quarterly Summaries of Number of Enforcement actions and inspections.					
D. Annual certification report.					
VI. EPA to submit audit report at year end.					

Grant Period 10/1/84 - 6/30/84

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
I. Toxic Substances							
A. Protect health and well being of school children attending schools that contain friable asbestos-containing materials.							
1. Provide assistance and technical advice to school district administrators in complying with the asbestos rule.	As Requested					.05	EPA
2. Inspect school districts for compliance with asbestos program requirements.			5	10		.20	EPA
B. Ensure mutual information exchange regarding significant toxics activities.						.05	EPA
1. Provide quarterly list of inspections performed.		1	1	1			EPA
2. Notify State of cases filed by EPA within 4 days of the action.							EPA
3. Consult with State on methods of dealing with PCB users both from a consulting and an enforcement viewpoint.							EPA
C. Report within thirty (30) days incidents involving chemical contamination.							DHES, DOA EPA
D. Implement PCB work plan.							EPA
1. Inspect facilities which store or use PCB-containing materials.		5	10			.20	

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
2. Prepare any technical documentation in support of enforcement actions for violations found during inspections within forty-five (45) days.						.10	EPA
E. Develop an information exchange to provide human health related data on environmental control activities and pollution incidents.	Ongoing						
F. Implement Section 13 Imports Compliance inspection program.	To Be Further Defined by Region					.10	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
II. Indian Activities	Date of Completion				
A. Air Programs - Assist tribes with ongoing programs.			.75	.10	EPA, AQB
1. Northern Cheyenne					
2. Fort Peck					
3. Flathead					
4. Fort Belknap					
5. Crow					
B. Pesticides - Assist Northern Cheyenne in developing certification program.				.10	EPA
III. Flathead Basin Commission					
Serve as EPA representative on Flathead Basin Committee.	4 meetings per year			.05	EPA
IV. Federal Agency EIS Review					
A. Impact Federal agencies (BLM, FS, BPA, USGS, OSM) to gain environmentally acceptable energy development, grazing and timber projects.					
B. Impact various Federal agencies to gain environmentally acceptable projects.					
1. Pre-EIS consultation/EIS review of Forest Service Management Plans.				.10	EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
2. Pre-EIS consultation/EIS review of BLM grazing plans, energy area land use plans, and other land use plans.	Date of Completion			.05	EPA
3. Pre-EIS consultation/EIS review of highway plans, airport plans, etc.				.10	EPA
4. Pre-EIS consultation/EIS review of water development projects.				.10	EPA
V. Quality Assurance Programs					
A. All Media					
1. Review State QA documentation annually.		6/85		.10	EPA/QAO
2. Provide reference samples one month after the request is received in Cincinnati.					EPA/CI
3. Support State's quality assurance activities and provide assistance as necessary.				.10	EPA/QAO MT
4. Submit annual Quality Assurance Report.			.05	.10	DHES
5. Submit QA program and/or project plan updates or revisions.					State
6. Evaluate and approve submitted QA program and project plan updates and revisions.		30 Days From Receipt		.10	EPA/QAO
7. Implement QA Program.			.03		DOA/DHES

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
VI. Emergency Response	Date of Completion				
A. Immediate removal action in response to releases or substantial threats of releases of hazardous substances.					
1. Upon request by the State provide Federal on-scene coordinator (OSC) to monitor responsible party action for all severe releases requiring immediate removal.	Ongoing			.10	EPA
2. Upon request by the State provide funding (if available) and OSC for immediate removal of releases when responsible party fails to provide proper response.	Ongoing			.10	EPA
3. Carry out all State responsibilities under the State Environmental Emergency Response Plan and provide State OSC to monitor responsible party action for releases where Federal OSC not required.	Ongoing		.10		State
B. Response to oil spills entering or threatening surface waters.					
1. Provide funding (if available) and direct cleanup of all spills when responsible party fails to properly respond.	Ongoing		.05	.10	EPA, State
2. Provide OSC for all major and selected medium spills to monitor response by responsible party.	Ongoing		.05	.10	EPA, State

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
3. Provide OSC for selected medium and all minor (when necessary) spills and carry out responsibilities under State Contingency Plans.	Date of Completion Ongoing		.10		State
C. Contingency Planning					
1. Update Region VIII Oil and Hazardous Substances Pollution Contingency Plan.		6/85		.10	EPA
2. Update State Environmental Emergency Response Plan.	As Needed		.10		State
D. Training of State and Local Emergency Response Personnel					
1. Ensure adequate safety training provided to State personnel responding to hazardous material emergencies.	Ongoing		.03		WQB

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
VII. Public Participation	Date of Completion				
A. Maintain mailing list of persons and organizations who have expressed an interest in or may be affected by any environmental issue or program.		4/85	.01	.02	DHES, DOA EPA
B. Provide copies of draft and final SEA to each state, public and college library.		5/85 6/85		.01	EPA
C. Provide draft and final Agreement to interested public.		As Requested		.01	EPA
D. Provide summary of comments to public who responded to requests for comments.		6/85	.02		DHES
E. Collect news articles about pertinent programs to determine public opinion.		Ongoing	.10	.06	DHES, DOA EPA
F. Prepare news release on pertinent matters and new developments on program areas to State and local government newsletters, local newspapers and TV and radio stations.		Ongoing	.03	.03	DHES, DOA EPA
G. Informal personal communications with individuals and groups.		Ongoing	1.00	.80	DHES, DOA EPA
H. Prepare required notice of public hearings and mail to appropriate interested and affected parties.		Ongoing	.02	.02	DHES, DOA EPA
I. Provide information on reporting procedures for permit violations.		Ongoing	.02	.01	DHES, DOA EPA